

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

MDL No. 3047

This Document Relates to:

ALL ACTIONS

**DEFENDANTS' TEMPORARY
SEALING MOTION (DEFENDANTS'
NOTICE OF BELLWETHER
DISCOVERY POOL SELECTIONS)**

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), Defendants file the instant Joint Temporary Sealing Motion requesting to file under seal limited portions of Defendants' Notice of Bellwether Discovery Pool Selections. The reasons for sealing will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Docket No.	Document	Party Information
Dkt. 900-1	Defendants' Notice of Bellwether Discovery Pool Selections (Sealed)	The document contains information designated as confidential by Plaintiffs.

Dated: May 24, 2024

Respectfully submitted,
FAEGRE DRINKER BIDDLE REATH LLP

/s/ Andrea R. Pierson
 Andrea Roberts Pierson, *pro hac vice*
 andrea.pierson@faegredrinker.com
 Amy Fiterman, *pro hac vice*
 amy.fiterman@faegredrinker.com
 Faegre Drinker LLP
 300 N. Meridian Street, Suite 2500
 Indianapolis, IN 46204
 Telephone: + 1 (317) 237-0300
 Facsimile: +1 (317) 237-1000

KING & SPALDING LLP

/s/ Geoffrey M. Drake
 Geoffrey M. Drake, *pro hac vice*
 gdrake@kslaw.com
 David Mattern, *pro hac vice*
 dmattern@kslaw.com
 King & Spalding LLP
 1180 Peachtree Street, NE, Suite 1600
 Atlanta, GA 30309
 Telephone: + 1 (404) 572-4600
 Facsimile: + 1 (404) 572-5100

Attorneys for Defendants TikTok Inc., ByteDance Inc., ByteDance Ltd., TikTok Ltd., and TikTok, LLC

COVINGTON & BURLING LLP

/s/ Mark W. Mosier

Mark W. Mosier, *pro hac vice*

mmosier@cov.com

Paul W. Schmidt, *pro hac vice*

pschmidt@cov.com

Phyllis A. Jones, *pro hac vice*

pajones@cov.com

COVINGTON & BURLING LLP

One CityCenter

850 Tenth Street, NW

Washington, DC 20001-4956

Telephone: + 1 (202) 662-6000

Facsimile: + 1 (202) 662-6291

Emily Johnson Henn (State Bar No. 269482)

ehenn@cov.com

COVINGTON & BURLING LLP

3000 El Camino Real

5 Palo Alto Square, 10th Floor

Palo Alto, CA 94306

Telephone: + 1 (650) 632-4700

Facsimile: +1 (650) 632-4800

Attorneys for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; Siculus, Inc.; and Mark Elliot Zuckerberg

MUNGER, TOLLES & OLSEN LLP

/s/ Jonathan H. Blavin

Jonathan H. Blavin (State Bar No. 230269)

Jonathan.Blavin@mto.com

MUNGER, TOLLES & OLSON LLP

560 Mission Street, 27th Floor

San Francisco, CA 94105-3089

Telephone: (415) 512-4000

Facsimile: (415) 512-4077

Rose L. Ehler (State Bar No. 296523)

Rose.Ehler@mto.com

Victoria A. Degtyareva (State Bar No. 284199)

Victoria.Degtyareva@mto.com

Ariel T. Teshuva (State Bar No. 324238)

Ariel.Teshuva@mto.com

MUNGER, TOLLES & OLSON LLP

350 South Grand Avenue, 50th Floor

Los Angeles, CA 90071-3426

Telephone: (213) 683-9100

Facsimile: (213) 687-3702

Lauren A. Bell, *pro hac vice*
Lauren.Bell@mto.com
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Ave., NW,
Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300

Attorneys for Defendant Snap Inc.

**WILSON SONSINI GOODRICH & ROSATI
Professional Corporation**

/s/ Brian M. Willen

Brian M. Willen, *pro hac vice*
Wilson Sonsini Goodrich & Rosati
bwillen@wsgr.com
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899

Lauren Gallo White (State Bar No. 309075)
Wilson Sonsini Goodrich & Rosati
lwhite@wsgr.com
Andrew Kramer (State Bar No. 321574)
akramer@wsgr.com
Carmen Sobczak (State Bar No. 342569)
csobczak@wsgr.com
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099

Christopher Chiou (State Bar No. 233587)
Wilson Sonsini Goodrich & Rosati
cchiou@wsgr.com
Matthew K. Donohue (State Bar No. 302144)
mdonohue@wsgr.com
633 West Fifth Street
Los Angeles, CA 90071-2048
Telephone: (323) 210-2900
Facsimile: (866) 974-7329

*Attorneys for Defendants YouTube, LLC,
Google LLC, and Alphabet Inc.*

MORGAN, LEWIS & BOCKIUS LLP

/s/ / Yardena R. Zwang-Weissman

Yardena R. Zwang-Weissman (SBN 247111)
yardena.zwang-weissman@morganlewis.com
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
Tel.: 213.612.7238

Brian Ercole (*pro hac vice*)
brian.ercole@morganlewis.com
600 Brickell Avenue, Suite 1600
Miami, FL 33131-3075
Tel.: 305.415.3416

Stephanie Schuster (*pro hac vice*)
stephanie.schuster@morganlewis.com
1111 Pennsylvania Avenue NW
Washington, DC 20004-2541
Tel.: 202.373.6595
*Attorneys for Defendants YouTube, LLC and
Google LLC*

WILLIAMS & CONNOLLY LLP

/s/ Joseph G. Petrosinelli

Joseph G. Petrosinelli
jpetrosinelli@wc.com
Ashley W. Hardin
ahardin@wc.com
680 Maine Avenue, SW
Washington, DC 20024
Telephone.: 202-434-5000
Fax: 202-434-5029

*Attorneys for Defendants YouTube, LLC,
Google LLC, and Alphabet Inc.*

ATTESTATION

I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document.

Dated: May 24, 2024

/s/ Andrea R. Pierson

Andrea R. Pierson